

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
GLOBAL EXPEDITED PACKAGE SERVICES 6 (MC2016-149)
NEGOTIATED SERVICE AGREEMENT

Docket No.
CP2016-261

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR LEAVE TO
REPLY TO PUBLIC REPRESENTATIVE RESPONSE TO MOTION
FOR PARTIAL RECONSIDERATION OF ORDER NO. 3488**
(September 12, 2016)

On September 1, 2016, the Postal Service moved for partial reconsideration of Order No. 3488 (August 25, 2016). The motion sought a determination that the revisions reflected in the models in USPS-LR-CP2016-261/NP1¹ constitute corrections of an error rather than changes in analytic principles, and, on that basis, that no separate proceeding should need to be initiated to review those revisions further. Pursuant to Order No. 3496 (September 2, 2016), the Public Representative filed a response to the motion on September 9, 2016. The Postal Service hereby moves for leave to file a brief reply to the Public Representative's response.

The thrust of the Public Representative's response is to acknowledge that new information may have assisted in reaching previously-lacking consensus on factual matters, but now assert that divisions exist on the necessary implications of those facts. The Postal Service submits that a brief reply by the Postal Service can clarify on those implications, and will assist the Commission in resolving the matter.

¹ Notice of the United States Postal Service of Filing of USPS-LR-CP2016-261/NP1, Docket No. CP2016-261, August 17, 2016.

Therefore, the Postal Service respectfully request leave to file the separately-submitted reply to the response of the Public Representative to the Postal Service's motion for partial reconsideration of Order No. 3488.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business and Service Development
Corporate and Postal Business Law Section

Eric Koetting
Kyle Coppin
Attorneys

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-2368; Fax -5628
Kyle.R.Coppin@usps.gov
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